

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE GENETICALLY MODIFIED)
RICE LITIGATION)
_____)

GRAY, RITTER & GRAHAM, P.C.,)
WOLF HALDENSTEIN ADLER)
FREEMAN & HERZ LLC, AND)
GRAY REED & MCGRAW, P.C.,)
on behalf of themselves and those similarly)
situated;)

and)

Don M. Downing and Adam J.)
Levitt, as Co-Trustees of the Common)
Benefit Trust Fund)

Plaintiffs,)

v.)

GOLDMAN PHIPPS PLLC, GOLDMAN)
PENNEBAKER & PHIPPS, P.C., PHIPPS)
CAVAZOS PLLC, MIKAL C. WATTS, P.C.,)
KELLER STOLARCZYK PLLC, MARTIN J.)
PHIPPS, MIKAL C. WATTS, BANKS LAW)
FIRM PLLC, CHARLES A. BANKS, STEPHEN)
B. MURRAY, SR. and MURRAY LAW FIRM)

Defendants.)

Case No. 4:13-cv-00206 CDP

DECLARATION OF TODD E. HILTON

1. My name is Todd E. Hilton. I am a partner at Stueve Siegel Hanson LLP and counsel of record in this case. I make the following declaration based on my personal knowledge and would be competent to testify regarding the matters herein, if called to do so.

2. I submit this Declaration in support of Plaintiffs' Memorandum in Support of their Position Regarding Discovery Disputes.

3. Attached as **Exhibit A** to this declaration are true and correct copies of Defendants' Responses and Objections to Plaintiffs' First Request for Production of Documents.

4. Attached as **Exhibit B** to this declaration are true and correct copies of Defendants' Responses and Objections to Plaintiffs' First Interrogatories.

5. Attached as **Exhibit C** to this declaration is a true and correct copy of a July 24, 2015 letter from Defendants' counsel to me regarding Defendants' deficient discovery responses.

6. Attached as **Exhibit D** to this declaration is a true and correct copy of a July 17, 2015 letter from me to Defendants' counsel regarding Defendants' deficient discovery responses.

7. Attached as **Exhibit E** to this declaration is a true and correct copy of leadership counsel's Motion to Intervene in the matter of *Kyle v. Bayer Cropscience, AG, et al.* pending in the Circuit Court of Woodruff County, Arkansas, which was produced by Keller Stolarczyk in this litigation and bears Bates no. KS-00002818 – 2822.

8. Attached as **Exhibit F** to this declaration is a true and correct copy of Plaintiffs' Responses to Defendants' First Request for Production of Documents Propounded to Plaintiffs.

9. Attached as **Exhibit G** to this declaration is a true and correct copy of Plaintiffs' Answers to Defendants' First Set of Interrogatories Propounded to Plaintiffs.

10. Attached as **Exhibit H** to this declaration is a true and correct copy of a July 24, 2015 letter from Defendants' counsel to me regarding Plaintiffs' discovery responses.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 11, 2015

/s/ Todd E. Hilton

Todd. E. Hilton